COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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In the Matter of:)	0	CT 01 2012
III the Matter of.)	PUB	LIC SERVICE MMISSION
INVESTIGATION OF THE FAILURE OF)	. CO	MMISSION
TRACFONE WIRELESS, INC. TO FILE)	CASE NO. 2011-00322	
REQUIRED REPORTS)		

MOTION FOR EXTENSION OF TIME TO SUBMIT RESPONSES TO INFORMATION REQUESTS

TracFone Wireless, Inc. ("TracFone") hereby respectfully moves the Commission for an extension of time until October 1, 2012 to submit its responses to the information requests propounded to it by the Commission. In support of that request, TracFone states as follows:

On August 30, 2012, the Commission, by its Executive Director, issued Commission Staff's First Request for Information to TracFone Wireless, Inc. That request contained a series of questions to which responses were requested on or before September 15, 2012. Copies of the information requests were not served on TracFone by electronic means and counsel for TracFone learned about the requests through an article in a telecommunications trade publication on August 31, 2012. Upon learning of the requests, counsel immediately contacted Commission staff who provided undersigned counsel with the requests. The requests were, however, received the next business day via U.S. Mail.

Compilation of the requested information and preparation of the responses took longer than had been anticipated making it impossible for TracFone to submit its responses by September 17. No party will be harmed by the two week extension requested herein. Accordingly, TracFone respectfully requests that the Commission extend the deadline for

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¹ September 15, 2012 -- the designated response date -- fell on a Saturday. Per standard practice, the responses would be due the next business day, *i.e.*, Monday, September 17, 2012.

responding to these information requests to October 1, 2012. TracFone's responses are being filed simultaneously herewith.

Respectfully submitted,

TRACFONE WIRELESS, INC.

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October 1, 2012

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